

# EXHIBIT 4

to the

MOTION *IN LIMINE* NO. 4 OF DEFENDANT CBS3 TO PRECLUDE  
REFERENCES TO GUIDELINES OF OTHER NEWS ORGANIZATIONS

WALTER E. HUNTER

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

- - -

ANDREA STRAUB,	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 2:14-cv-05634-MMB
	:	
vs.	:	
	:	
	:	
CBS BROADCASTING, INC., t/a	:	
CBS 3,	:	
	:	
Defendant.	:	

- - -

Oral sworn testimony of WALTER E.  
HUNTER, held at THE BEASLEY FIRM, LLC, 1125 Walnut  
Street, Philadelphia, Pennsylvania, taken on Tuesday,  
February 3, 2015, commencing at 12:05 p.m., before  
Lynda DiGrazio-Smith, a NJ Certified Court Reporter  
(Lic. #30XI002212), Certified Livenote Reporter,  
Licensed CaseViewNet Realtime Provider and Notary  
Public within and for the State of New Jersey.

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WALTER E. HUNTER

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WALTER E. HUNTER

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1 Q. Have you won awards for investigative  
2 reporting?

3 A. Yes.

4 Q. As a matter of fact, you won something  
5 from the Society of Professional Journalists; is  
6 that right?

7 A. Yes.

8 Q. What is the Society of Professional  
9 Journalists?

10 A. It's a professional society of  
11 journalists which would probably roughly equivalent  
12 to, well a very small way to the bar association,  
13 medical profession, it's a group of professional  
14 journalists.

15 Q. You accepted an award from them for some  
16 of your reporting in the past. Correct?

17 A. Yes.

18 Q. Are you a member of the Society of  
19 Professional Journalists?

20 A. No.

21 Q. So with regard to your 42, 43 years of  
22 investigative reporting, when you spoke with Officer  
23 Pepitone, did you ask her whether there was a  
24 source, other than Eric Welsh, for the allegations

WALTER E. HUNTER

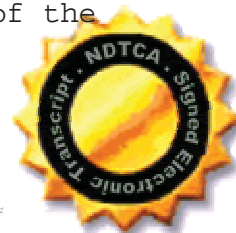
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## 1 C E R T I F I C A T I O N

2 I, Lynda DiGrazio-Smith, a NJ Certified  
3 Court Reporter (License No. 2212) and Notary Public of  
4 the State of New Jersey, do hereby certify that the  
5 proceedings, evidence, and objections upon the  
6 deposition of WALTER E. HUNTER, are contained fully  
7 and accurately in the stenographic notes taken by me  
8 upon the foregoing matter, on February 3, 2015, and  
9 that this is a true and correct transcript of same.

10 I further certify that I am neither an  
11 attorney nor counsel of any of the parties in the  
12 above proceedings, nor a relative or employee of any  
13 attorney or counsel employed by the parties hereto,  
14 nor financially interested in the outcome of the  
15 within proceedings.

16  
17 



18  
19 LYNDA DIGRAZIO-SMITH, Certified  
20 Court Reporter of the State  
21 of New Jersey License No. 30XI002212  
22 Notary No. 2174751

23  
24 My notary commission expires August 7, 2016.